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# Yale Law School

January 17, 2020

## BY ECF

The Honorable Stewart D. Aaron United States Magistrate Judge Daniel P. Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: The New York Times Company et al. v. United States Bureau of Alcohol, Tobacco,

Firearms, and Explosives, 18 Civ. 2902 (SDA)

### Dear Judge Aaron:

We write on behalf of both parties in the above-referenced action to submit a joint status report. As previously noted, Plaintiffs in this case sought records of communications regarding bump stocks and/or replacement shoulder stocks for AR-15 style rifles from the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATFE"), pursuant to the Freedom of Information Act ("FOIA").

As the parties noted in the joint status report they submitted on December 18, 2019, Plaintiffs are satisfied with the records produced by ATFE and have submitted a fee request. Defendant has since submitted a counter-proposal on attorney fees, and the parties are continuing to confer. The parties propose that they submit a joint status report by February 17, 2020, by which time they hope to be able to have fully resolved this matter.



Page 2 of 2

We thank the Court for its time and consideration.

# Respectfully submitted,

#### /s/ Charles Crain

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